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Hearing Date: March 28, 2018  
Time: 10:00 a.m.

Response Due: March 23, 2018  
Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BNP PARIBAS S.A., BNP PARIBAS ARBITRAGE  
SNC, BNP PARIBAS BANK & TRUST (CAYMAN)  
LIMITED, and BNP PARIBAS SECURITIES  
SERVICES S.A.,

Defendants.

Adv. Pro. No. 12-01576 (SMB)

**NOTICE OF MOTION TO COMPEL**

PLEASE TAKE NOTICE that, upon the accompanying Motion, Memorandum of Law, and Declaration of Jonathan A. Forman, Esq. (“Forman Declaration”), Irving H. Picard, as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.* (“SIPA”), and the estate of Bernard L. Madoff, by and through his undersigned counsel, will move the Court for entry of the proposed Order, submitted herewith, compelling Defendants BNP Paribas S.A., BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust (Cayman) Limited, and BNP Paribas Securities Services S.A. to produce documents responsive to certain discovery requests identified in the accompanying Memorandum of Law and Forman Declaration.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be (i) in writing, conform to the applicable rules of this Court, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York, 10004, in accordance with Local Rule 9006-1 of the United States Bankruptcy Court, Southern District of New York by no later than 5:00 p.m. on March 23, 2018 (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein); and (ii) served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan and Torello H. Calvani; and (b) Securities Investor Protection Corporation, 1667 K Street NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objections must state the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the Motion shall be deemed uncontested and an order

granting the requested relief may be entered with no further notice or opportunity to be heard  
offered to any party.

Dated: February 9, 2018  
New York, NY

**BAKER & HOSTETLER LLP**

By: /s/ David J. Sheehan

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Investment Securities LLC and the estate  
of Bernard L. Madoff*